

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 1:17-mc-00151-LPS

**PDVSA’S JOINDER IN CITGO AND PDVH’S ANSWERING BRIEF AND
ADDITIONAL OBSERVATIONS REGARDING THE SALE PROCESS**

Petróleos de Venezuela, S.A. (“PDVSA”) joins in the Answering Brief filed by CITGO Petroleum Corporation (“CITGO”) and PDV Holding, Inc. (“PDVH”) responding to the Special Master’s proposal concerning the sale process and addressing other matters the Court identified in its Order and Inclinations, D.I. 1433.

CITGO and PDVH rightly identify a number of reasons why a restart of the bidding process, with the modifications proposed by CITGO and PDVH, are necessary if there is to be any hope of repairing the damage done by the flawed sale process to date.¹ The schedule and the modifications proposed by PDVH and CITGO have the benefit of leaving open the possibility of PDVSA exercising its right to participate in the auction or to propose additional solutions in the future.

¹ For avoidance of doubt, nothing herein should be construed to imply consent to a forced sale under any circumstances, and PDVSA preserves all rights and positions, including on appeal.

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Respectfully submitted,

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